

## **EXHIBIT 4**

John Y. Bonds, III  
 State Bar I.D. No. 02589100  
 Clay Taylor  
 State Bar I.D. No. 24033261  
 Bryan C. Assink  
 State Bar I.D. No. 24089009  
 BONDS ELLIS EPPICH SCHAFFER JONES LLP  
 420 Throckmorton Street, Suite 1000  
 Fort Worth, Texas 76102  
 (817) 405-6900 telephone  
 (817) 405-6902 facsimile

Deborah Deitsch-Perez  
 State Bar No. 24036072  
 Michael P. Aigen  
 State Bar No. 24012196  
 STINSON LLP  
 3102 Oak Lawn Avenue, Suite 777  
 Dallas, Texas 75219  
 (214) 560-2201 telephone  
 (214) 560-2203 facsimile

ATTORNEYS FOR DEFENDANT JAMES DONDERO

**IN THE UNITED STATES BANKRUPTCY COURT  
 FOR THE NORTHERN DISTRICT OF TEXAS  
 DALLAS DIVISION**

<p><b>In re:</b></p> <p><b>HIGHLAND CAPITAL MANAGEMENT, L.P.</b></p> <p style="padding-left: 40px;"><b>Debtor.</b></p>	<p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p>	<p><b>Case No. 19-34054</b></p> <p><b>Chapter 11</b></p>
<p><b>HIGHLAND CAPITAL MANAGEMENT, L.P.,</b></p> <p style="padding-left: 40px;"><b>Plaintiff.</b></p> <p><b>v.</b></p> <p><b>JAMES D. DONDERO,</b></p> <p style="padding-left: 40px;"><b>Defendant.</b></p>	<p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p>	<p><b>Adversary No. 21-03003-sgj</b></p>

**DEFENDANT JAMES DONDERO'S OBJECTIONS AND ANSWERS  
 TO HIGHLAND CAPITAL MANAGEMENT, L.P.'S  
FIRST SET OF INTERROGATORIES**

TO: Highland Capital Management, L.P., by and through its attorneys of record, Zachery Z. Annable, Hayward PLLC, 10501 N. Central Expy., Ste. 106, Dallas, Texas 75231.

Defendant James Dondero ("Defendant" or "Dondero") serves his Objections and Answers to Debtor Highland Capital Management, L.P.'s ("Debtor" or "Highland") First Set of Interrogatories ("Requests"), as follows:

Dated: 4/26/2021

Respectfully submitted,

/s/ Bryan C. Assink

John Y. Bonds, III

State Bar I.D. No. 02589100

Clay Taylor

State Bar I.D. No. 24033261

Bryan C. Assink

State Bar I.D. No. 24089009

BONDS ELLIS EPPICH SCHAFFER JONES LLP

420 Throckmorton Street, Suite 1000

Fort Worth, Texas 76102

(817) 405-6900 telephone

(817) 405-6902 facsimile

Email: john@bondsellis.com

Email: joshua@bondsellis.com

Email: bryan.assink@bondsellis.com

-and-

Deborah Deitsch-Perez

State Bar No. 24036072

Michael P. Aigen

State Bar No. 24012196

STINSON LLP

3102 Oak Lawn Avenue, Suite 777

Dallas, Texas 75219

(214) 560-2201 telephone

(214) 560-2203 facsimile

Email: deborah.deitschperez@stinson.com

Email: michael.aigen@stinson.com

**ATTORNEYS FOR DEFENDANT JAMES DONDERO**

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that, on 4/26/2021, a true and correct copy of the foregoing document was served via email on counsel for the Debtor.

/s/ Bryan C. Assink  
Bryan C. Assink

## **OBJECTIONS AND ANSWERS**

**INTERROGATORY NO. 1:** With respect to each Note, identify:

- (a) the person who entered into each Purported Agreement on behalf of the Debtor;
- (b) the date each Purported Agreement was entered into; and
- (c) all documents that reflect or memorialize each Purported Agreement.

**ANSWER:**

The Agreements were entered into on behalf of the Debtor by James Dondero, subsequent to the time each Note was executed. Documents reflecting or memorializing the Agreements, if any, will be produced at a mutually agreeable time and location.

**INTERROGATORY NO. 2:** Identify every person who James Dondero believes has actual knowledge of each Purported Agreement.

**ANSWER:**

Dondero objects to this interrogatory (1) to the extent it seeks privileged information, (2) because it requires Dondero to speculate as to what other people know and believe, and (3) because the phrase "actual knowledge" is not defined. Subject to these objections, Dondero believes the following individuals may have actual knowledge of each Purported Agreement:

James Dondero

Frank Waterhouse

Mark Okada

John Honis

Scott Ellington

**INTERROGATORY NO. 3:** Identify (a) anything of value that was received by James Dondero (or for his benefit) in exchange for each Note, and (b) the date anything of value that was received by James Dondero (or for his benefit) in exchange for each Note.

**ANSWER:**

Dondero received the funds evidenced in each Note on or about the date that each Note was entered into by the parties to the Notes.

**INTERROGATORY NO. 4:** Identify each witness James Dondero intends to call at trial in this Adversary Proceeding.




**ANSWER:**

Dondero will identify witnesses in accordance with the scheduling order governing this proceeding.

VERIFICATION


STATE OF TEXAS       )  
                                  )  
COUNTY OF DALLAS    )

On this day, James D. Dondero appeared before me, the undersigned notary public, and upon his oath, certified that he had read Defendant's Objections and Answers to Highland Capital Management, L.P.'s First Set of Interrogatories and that the facts stated therein are within his personal knowledge and are true and correct.

  
\_\_\_\_\_  
JAMES D. DONDERO

SWORN TO and SUBSCRIBED before me by James D. Dondero on the 26th day of April, 2021.



  
\_\_\_\_\_  
Notary Public in and for the State of Texas